



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

WA 2917

~~5-12-88~~

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6/14/1988

FILE COPY

REPLY TO
ATTN OF: ES-098

MEMORANDUM

SUBJECT: CERCLA Offsite Compliance Inspection at Chemical Processors, Inc. (Pier 91) EPA I.D. No. WAD00812917

FROM: Jim Pankanin, Environmental Engineer *J. Pankanin*
Engineering and Investigations Section

TO: Chuck Rice, Chief
RCRA Compliance Section

THRU: Paul A. Boys, Chief *Paul Boys*
Engineering and Investigations Section

FACILITY REVIEW:

On May 12, 1988, I conducted RCRA compliance inspection at Chemical Processors, Inc. Pier 91 facility (Chem Pro). As required by the U.S. EPA CERCLA Offsite Policy, a RCRA-regulated facility must be in compliance with all applicable RCRA regulations before the facility is allowed to handle any CERCLA wastes. It is U.S. EPA policy to inspect such commercial off-site facilities twice a year. Chem-Pro was represented at the inspection by Peter Ressler, compliance manager, Ron Atwood, operations manager, and Nate Mathews, plant manager. The most recent prior U.S. EPA inspection of this facility was conducted on September 28, 1987.

The Chem Pro facility is located on Pier 91, a former U.S. Naval facility located on the northern waterfront of Elliot Bay. The site is owned by the Port of Seattle and has been leased to Chem Pro since approximately 1971. Chem Pro receives and treats large quantities of bilge and ballast waters as well as industrial wastewaters. The main function of this Chem Pro facility is waste oil reclamation, not hazardous waste treatment and storage. The reclaimed waste oil is sold to Pacific Northern Oil to be used as cutting stock in marine fuel oils. About sixty percent (60%) of the Chem Pro Pier 91 site is subleased by Chem Pro to Pacific Northern Oil. Chem Pro notified EPA of its waste oil marketing activities on January 27, 1986 (Attachment 1).

USEPA RCRA



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The most recent Part A application for the facility was submitted to the Washington Department of Ecology (Ecology). This Part A was dated February 18, 1986. This Part A lists 22 hazardous waste streams that may be treated and stored in tanks at Chem Pro. All the known tanks at the facility are above ground except the oil-water separator, which is used for treating incoming oily wastewaters. The Part A application reported a tank storage capacity of 9,036,090 gallons, and a tank treatment capacity of 40,000 gallons per day. For a more thorough description of the tank usage and hazardous waste treatment processes, refer to the Ecology compliance inspection report dated June 22, 1987, by Lawrence Ashley. In response to my question, Nate Mathews of Chem Pro stated that about twenty percent (20%) of the materials coming into Chem Pro for treatment are manifested hazardous wastes. He stated that this volume averages 300,000 gallons per month. The rest of the incoming materials are non-hazardous (under RCRA) waste oils and oily wastewater. Nate Mathews also stated that this facility has received no Superfund wastes in the past year. Mr. Mathews also explained that there are currently ten (10) employees at this facility. Operations are two shifts per day.

OBSERVATIONS:

We began the site tour at the boiler located in the southern end of the building. Nate Mathews stated that the boiler is operated by Pacific Northern Oil and burns only virgin fuel oil. We proceeded onto the catwalk over the bermed tank farm. All the tanks were covered and the ground within the bermed area was paved with concrete. Nate Mathews stated that the tank level gauges are checked at least twice per operating day. No active leaks or freshly stained areas around the tanks were observed. Chem Pro representatives explained that one of the oily wastewater treatment tanks was overfilled on March 4, 1988. Approximately 119 drums of oily wastewater were recovered from within the bermed area. There was no observed release beyond the bermed area. None of the tanks have high level alarms.

I observed that the sludge decanter/centrifuge unit was not operating. Nate Mathews stated that this unit had not been operational for at least a year, however repairs were almost completed. Waste sludges have been building up in several tanks pending treatment in the decanter/centrifuge unit prior to shipping offsite. I noted that there were no drums of waste stored within or alongside of the tank farm areas. Nate Mathews explained that the drums observed in the large tank area during the September 28, 1987, inspection were shipped to the Chem Pro-Georgetown facility. Inside the warehouse, there were also no longer any drums of waste in storage. There were many drums of oil treatment and wastewater treatment chemicals in the warehouse. The drums were well organized and in good condition. I asked about emergency fire control equipment. Ron Atwood of Chem Pro explained that all extinguishers are checked annually and that there is a foam fire control system throughout the facility.

DOCUMENT REVIEW:

While at Chem Pro, I examined the manifest file, inspection log sheets and personnel training records. The daily inspection form did not include the time of the inspection as required by 40CFR265.15 (d). I mentioned this omission to the Chem Pro representatives who later sent me a revised inspection form with time included (attachment 2). I checked the training records for the three newest employees. No problems with the records or the manifests were noted. I asked about documents concerning financial assurance for closure. I was shown a document dated March, 1988, which verified financial assurance for \$403,000. However, in my subsequent review of the September 18, 1987, closure plan and the 1987 Annual TSD report, it was noted that closure costs were estimated to be \$636,102 (attachment 3).

Copies of the waste analysis plan (dated 2/26/86), closure plan (dated 9/18/87) and contingency plan (dated 10/6/87) were available at the facility during the inspection. A detailed review of these documents was not completed as part of this inspection, since these plans have been referred to the EPA TES contractor for a separate evaluation and report. The same contractor has completed a draft RCRA Facility Assessment (RFA) dated April 28, 1988, which provides a great deal of information regarding this facility. Another recently completed report regarding the Chem Pro Pier 91 facility is the May, 1988, Phase I Hydrogeological Investigation done by Sweet-Edwards/EMCON Inc. This investigation included sampling from eight groundwater monitoring wells. All of these plans and reports will be retained with this report original in the Region 10 RCRA Compliance File.

Attachments

cc: J. Boller w/attachments